

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

-----X
JOHN DOE,

Plaintiff,

Civil Action No:

NOTICE OF MOTION

-against-

**UNIVERSITY OF TEXAS HEALTH SCIENCE
CENTER AT HOUSTON, UNIVERSITY
OF TEXAS BOARD OF REGENTS,
MARGARET MCNEESE, in her individual
and official capacity, DEANA MOYLAN,
in her individual and official capacity,
SHEELA LAHOTI, in her individual and
official capacity, and DANA MCDOWELLE,
in her individual and official capacity,**

Defendants.

-----X

PLEASE TAKE NOTICE that Plaintiff, through his attorneys, Nesenoff & Miltenberg, LLP, and Jordan, Lynch & Cancienne PLLC hereby moves this Court for an *ex parte* order: (i) authorizing Plaintiff to file the Complaint, summons, and civil cover sheet in this action using the pseudonym “John Doe,” and to litigate this matter as John Doe, and to file all other papers in this action under the name John Doe, and to identify certain other non-parties by pseudonym; and (ii) prohibiting Defendants (and their agents, employees, and representatives) from publicly identifying Plaintiff, in court filings or otherwise.

PLEASE TAKE FURTHER NOTICE THAT Plaintiff shall rely upon the Complaint and accompanying Memorandum of Law and the Declaration of Andrew Miltenberg, Esq., in support of the Motion. Plaintiff also submits a proposed form of Order with this Motion.

Dated: New York, New York
April 30, 2021

Respectfully submitted,

NESENOFF & MILTENBERG, LLP
Attorneys for Plaintiff John Doe

By: /s/ *Andrew Miltenberg*
Andrew T. Miltenberg, Esq. (*pro hac vice*
pending)
Tara J. Davis, Esq. (*pro hac vice pending*)
363 Seventh Avenue, Fifth Floor
New York, New York 10001
(212) 736-4500
amiltenberg@nmlplaw.com
tdavis@nmlplaw.com

-and-

JORDAN, LYNCH & CANCIENNE PLLC

By: /s/ *Walter Lynch*
Walter Lynch, Esq.
State Bar No. 24046330
Federal ID No. 965265
Amir Halevy, Esq.
State Bar No. 24065356
Federal ID No. 1259956
1980 Post Oak Blvd, Suite 2300
Houston, Texas 77056
(713) 955-4021
wlynch@jlcfirm.com
ahalevy@jlcfirm.com

